

**KESSLER TOPAZ**

**MELTZER & CHECK, LLP**

STACEY M. KAPLAN (Bar No. 241989)

(skaplan@ktmc.com)

One Sansome Street, Suite 1850

San Francisco, CA 94104

Tel: (415) 400-3000

Fax: (415) 400-3001

*Counsel for Lead Plaintiff Lannebo Kapitalförvaltning AB and  
Co-Lead Counsel for the Class*

**BERNSTEIN LITOWITZ BERGER**

**& GROSSMANN LLP**

JONATHAN D. USLANER (Bar No. 256898)

(jonathanu@blbglaw.com)

2121 Avenue of the Stars, Suite 2575

Los Angeles, CA 90067

Tel: (310) 819-3472

*Counsel for Lead Plaintiff Stichting Pensioenfonds PGB and  
Co-Lead Counsel for the Class*

*[Additional counsel listed on signature page]*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

In re NVIDIA CORPORATION SECURITIES  
LITIGATION

Case No. 4:18-cv-07669-HSG

CLASS ACTION

This Document Relates to: All Actions.

**STIPULATION AND JOINT REQUEST  
TO EXTEND DEADLINES FOR CLASS  
CERTIFICATION BRIEFING AND  
ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.  
Courtroom: 2

1 Pursuant to Civil Local Rules 6-2 and 7-12, Co-Lead Plaintiffs Lannebo Kapitalförvaltning AB and  
2 Stichting Pensioenfonds PGB (collectively, “Plaintiffs”) and Defendants NVIDIA Corporation and Jensen  
3 Huang (“Defendants”), by and through their respective counsel, hereby agree and stipulate as follows:

4 WHEREAS, on March 25, 2025, the Court entered a scheduling order and set the following  
5 deadlines related to class certification: Plaintiffs’ motion was due by July 11, 2025; Defendants’ opposition  
6 is due by September 11, 2025; Plaintiffs’ reply is due by October 16, 2025, and a hearing is scheduled for  
7 November 6, 2025 at 2:00 p.m. (ECF No. 205);

8 WHEREAS, on July 11, 2025, Plaintiffs filed their motion for class certification (ECF No. 237),  
9 which was supported by, among other things, the Expert Report of Joseph R. Mason, Ph.D.;

10 WHEREAS, Defendants seek to depose Dr. Mason prior to the filing of their opposition to  
11 Plaintiffs’ motion for class certification;

12 WHEREAS, there are no dates prior to September 4, 2025, on which Dr. Mason, Plaintiffs’ counsel,  
13 and Defendants’ counsel are all available to conduct the deposition;

14 WHEREAS, the parties have agreed to conduct Dr. Mason’s deposition on September 4, 2025;

15 WHEREAS, given the time between Dr. Mason’s deposition and the deadline for Defendants’  
16 opposition to Plaintiffs’ motion for class certification, the parties jointly request a one-week extension of  
17 the deadline for Defendants’ opposition, from September 11, 2025 to September 18, 2025, and a  
18 corresponding one-week extension of the deadline for Plaintiffs’ reply in support of its motion for class  
19 certification, from October 16, 2025 to October 23, 2025;

20 WHEREAS, the parties do not seek this one-week extension of the deadlines for class certification  
21 briefing for purposes of delay, and the proposed new deadline will not impact any other dates set by the  
22 Court;

23 WHEREAS, in support of this Stipulation, and in accordance with the requirements of Civil Local  
24 Rule 6-2(a), Plaintiffs submit the Declaration of Matthew L. Mustokoff herewith.

25 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the parties,  
26 through their undersigned counsel of record, and respectfully requested, that the Court order as follows:

27 1. The deadline for Defendants’ opposition to Plaintiffs’ motion for class certification is  
28

1 extended from September 11, 2025 to September 18, 2025; and

2 2. The deadline for Plaintiffs' reply in support of its motion for class certification is extended  
3 from October 16, 2025 to October 23, 2025.

4 Dated: August 11, 2025

Respectfully submitted,

5 **KESSLER TOPAZ**  
6 **MELTZER & CHECK, LLP**

7 /s/ Matthew L. Mustokoff

Matthew L. Mustokoff (appearance *pro hac vice*)<sup>1</sup>  
(mmustokoff@ktmc.com)

8 Jamie M. McCall (appearance *pro hac vice*)  
(jmccall@ktmc.com)

9 Nathan A. Hasiuk (appearance *pro hac vice*)  
(nhasiuk@ktmc.com)

10 Nathaniel C. Simon (appearance *pro hac vice*)  
(nsimon@ktmc.com)

280 King of Prussia Road  
Radnor, PA 19087

12 Tel: (610) 667-7706

13 Fax: (610) 667-7056

14 -and-

15 Stacey M. Kaplan (Bar No. 241989)  
(skaplan@ktmc.com)

16 One Sansome Street, Suite 1850  
San Francisco, CA 94104

17 Tel: (415) 400-3000

Fax: (415) 400-3001

18 *Counsel for Lead Plaintiff Lannebo Kapitalförvaltning AB*  
19 *and Co-Lead Counsel for the Class*

20 **BERNSTEIN LITOWITZ BERGER**  
21 **& GROSSMANN LLP**

22 Jonathan D. Uslander (Bar No. 256898)  
(jonathanu@blbglaw.com)

23 2151 Avenue of the Stars, Suite 2575  
Los Angeles, CA 90067

24 Tel: (310) 819-3472

25 -and-

26  
27  
28 <sup>1</sup> In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the signatories.

1 John Rizio-Hamilton (appearance *pro hac vice*)  
(johnr@blbglaw.com)  
2 Preethi Krishnamurthy (appearance *pro hac vice*)  
(preethi@blbglaw.com)  
3 Michael M. Mathai (appearance *pro hac vice*)  
(michael.mathai@blbglaw.com)  
4 1251 Avenue of the Americas  
New York, NY 10020  
5 Tel: (212) 554-1400  
6 Fax: (212) 554-1444

7 *Counsel for Lead Plaintiff Stichting Pensioenfonds PGB*  
8 *and Co-Lead Counsel for the Class*

9 **COOLEY LLP**

10 /s/ Patrick E. Gibbs

11 Patrick E. Gibbs (183174)  
(pgibbs@cooley.com)  
12 Amanda A. Main (260814)  
(amain@cooley.com)  
13 John C. Bostic (264367)  
(jbostic@cooley.com)  
14 Brett De Jarnette (292919)  
(bdejarnette@cooley.com)  
15 3175 Hanover Street  
Palo Alto, CA 94304-1130  
16 Telephone: (650) 843-5000  
17 Facsimile: (650) 849-7400

18 Sarah M. Lightdale (4395661)  
(slichtdale@cooley.com)  
19 55 Hudson Yards  
New York, NY 10001-2157  
20 Telephone: (212) 479-6000  
21 Facsimile: (212) 479-6275

22 **MILBANK LLP**

23 Scott A. Edelman  
(sedelman@milbank.com)  
24 Jed M. Schwartz  
(jschwartz@milbank.com)  
25 Andrew B. Lichtenberg  
(alichtenberg@milbank.com)  
26 55 Hudson Yards  
New York, NY 10001  
27 Tel.: (212) 530-5000  
28 Fax.: (212) 530-5219

1 Olivia S. Choe  
2 (ochoe@milbank.com)  
3 1101 New York Avenue, NW  
4 Washington, D.C. 20005  
5 Tel.: (202) 835-7500  
6 Fax.: (202) 263-7586

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
*Counsel for Defendants NVIDIA Corporation and Jensen Huang*

**ORDER**

Having considered the parties' Stipulation and Joint Request to Extend Deadlines for Class Certification Briefing, and good cause appearing therefore, IT IS HEREBY ORDERED that the Joint Request is GRANTED:

1. The deadline for Defendants' opposition to Plaintiffs' motion for class certification is extended from September 11, 2025 to September 18, 2025; and

2. The deadline for Plaintiffs' reply in support of its motion for class certification is extended from October 16, 2025 to October 23, 2025.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 8/11/2025



The Honorable Haywood S. Gilliam, Jr.  
United States District Judge